



## 32 **1. Introduction**

33 Shipping is a vital component of the global supply chain, enabling international  
34 trade and contributing to globalization. In 2020, ships were responsible for over 80%  
35 of global merchandise trade, amounting to 10.9 billion metric tons in volume  
36 (UNCTAD, 2020). However, due to the shipping industry's reliance on fossil fuels,  
37 large amounts of GHGs, e.g., carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane  
38 (CH<sub>4</sub>), and ozone (O<sub>3</sub>), and pollutants, e.g., sulfur oxides (SO<sub>x</sub>) and nitrous oxides  
39 (NO<sub>x</sub>), are released into the atmosphere. These emissions not only exacerbate global  
40 warming but also lead to ocean acidification and air pollution. According to the Fourth  
41 International Maritime Organization (IMO) GHG Study, the international maritime  
42 industry was responsible for approximately 2.76% of GHG emissions in 2012, and this  
43 value increased by 4.70% in 2018 (IMO, 2020). The percentage is predicted to rise to  
44 18% by 2050 if no measures are adopted (Rahim et al., 2016).

45 According to the initial IMO GHG Strategy, by 2050 the IMO aims to halve annual  
46 GHG emissions from global shipping compared with their levels in 2008 (IMO, 2018a).  
47 To achieve this target, the IMO is actively seeking to reduce GHG emissions from  
48 international shipping through various measures. One is the Energy Efficiency Design  
49 Index (EEDI) (IMO, 2011), a technical standard that establishes CO<sub>2</sub> emissions limits  
50 for new ships. Another measure implemented by the IMO is the Ship Energy Efficiency  
51 Management Plan (SEEMP) (IMO, 2011). This plan mandates that ship owners and  
52 operators create and execute strategies to enhance the energy efficiency of their ships.  
53 Furthermore, the IMO promotes the adoption of alternative fuels such as biofuels and  
54 hydrogen, as well as electric power, to minimize the shipping industry's carbon  
55 footprint<sup>1</sup>. The EU, an active participant in the IMO, also seeks to address climate  
56 change and achieve a carbon-neutral economy by 2050 (European Commission, 2019).  
57 To achieve these goals, the EU has implemented several initiatives. One encourages the  
58 use of alternative fuels and improved energy efficiency measures for existing vessels.  
59 Additionally, the EU has implemented a mandatory MRV system, which applies to  
60 vessels over 5,000 gross tonnage that enter, leave, or operate in the ports of EU member  
61 states. The MRV system allows the EU to gather accurate information about large ships  
62 by monitoring their fuel consumption, CO<sub>2</sub> emissions, distance traveled, time spent at  
63 sea, details of cargo carried, transport work, and average energy efficiency. These

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<sup>1</sup> <https://www.imo.org/en/MediaCentre/HotTopics/Pages/Cutting-GHG-emissions.aspx>.

64 comprehensive data can be used to incentivize energy efficiency enhancements and  
65 facilitate sustainable shipping practices within the EU, ultimately reducing the shipping  
66 industry's environmental impact and contributing to the EU's climate goals (EU, 2015).

67 Established under EU Regulation 2015/757 (EU, 2015), the MRV system involves  
68 several key steps. First, the shipping company develops a monitoring plan that outlines  
69 its approach to monitoring and reporting CO<sub>2</sub> emissions and other relevant data for each  
70 ship exceeding 5,000 gross tonnage; this plan must be submitted to an accredited  
71 verifier for assessment and approval. Upon approval, the shipping company is  
72 responsible for collecting data on the fuel consumption, CO<sub>2</sub> emissions, and transport  
73 work of the vessels in its fleet, in accordance with the approved monitoring plan.  
74 Following the reporting period, an emission report must be compiled, independently  
75 verified for accuracy and compliance, and then submitted to the European Commission  
76 and the relevant flag state authorities. The EU publishes a list of compliant ships and  
77 anonymized data on their emissions and efficiency, encouraging transparency and  
78 accountability within the maritime transport sector. By implementing this framework,  
79 the EU pursues a more sustainable maritime transport sector and contributes to the  
80 broader global efforts to combat climate change.

81 The EU has released MRV data for the 2018–2021 period, which are publicly  
82 available on the website of the European Maritime Safety Agency (EMSA). Despite  
83 their availability, few studies have analyzed the key parameters of MRV data, but this  
84 is essential to understand the effectiveness of the MRV system and identify areas for  
85 improvement. A study conducted by Yan et al. (2023) compared and analyzed the MRV  
86 data for 2018 and 2019, highlighting the need for further research in this area. However,  
87 due to data limitations, their study did not investigate the temporal trends of the key  
88 parameters covered by the MRV data. The analysis of temporal trends can provide  
89 valuable insights into the changes in energy efficiency and CO<sub>2</sub> emissions of ships  
90 calling at EU ports since the launch of the MRV system, helping to determine whether  
91 the MRV system promotes the decarbonization of shipping and assists in the  
92 achievement of the EU's emissions reduction targets. Moreover, there is limited  
93 research on the impact of the MRV system's implementation on company fleets' carbon  
94 emissions.

95 To address the above gaps, this study first conducts an in-depth analysis of the  
96 emission reports acquired by the MRV system between 2018 and 2021 (encompassing  
97 the latest release as of March 2023), examining trends in ship's basic information,

98 emissions monitoring methods and results, and ship energy efficiency. Additionally,  
99 we conduct a case study of five shipping companies to examine the improvements in  
100 the CO<sub>2</sub> emissions of their vessels during the implementation of the MRV system. For  
101 each shipping company, the case study investigates in detail the differences in annual  
102 CO<sub>2</sub> emissions per distance for two consecutive years, utilizing the Wilcoxon signed-  
103 rank test. This study contributes to our understanding of the MRV system and its impact  
104 on the shipping industry.

105 This study provides valuable insights into the MRV system's impact on the  
106 shipping industry and its efforts to reduce carbon emissions. Through a comprehensive  
107 analysis of MRV data collected from 2018 to 2021, we highlight several key trends in  
108 ships' basic profiles, CO<sub>2</sub> emissions, and energy efficiency. Specifically, the study  
109 identifies the impact of the COVID-19 pandemic on the shipping industry by  
110 highlighting the decline in the number of ships of different types recorded in the MRV  
111 system between 2019 and 2020, with passenger ships being the most affected. In  
112 addition, declines in annual fuel consumption and CO<sub>2</sub> emissions are identified, as  
113 evidenced by a decreasing percentage of ships with high fuel consumption and CO<sub>2</sub>  
114 emissions over time. This finding indicates progress toward reducing the industry's  
115 carbon footprint. Furthermore, as of 2015, ships in sulfur emission control areas  
116 (SECAs) are required to utilize marine fuels with a maximum sulfur content of 0.1%  
117 (IMO, 2008); as of 2020, ships outside SECAs must limit the sulfur content of their  
118 fuel oil to a maximum of 0.5% (IMO, 2016). These increasingly stringent sulfur  
119 emissions regulations resulted in a significant decrease in heavy fuel oil usage in 2020,  
120 alongside a surge in light fuel oil consumption. This shift suggests that the industry is  
121 gradually transitioning toward more sustainable fuel options. With regard to ships'  
122 energy efficiency, the decline in the mean value of their annual average CO<sub>2</sub> emissions  
123 per distance in the first two years following the MRV system's implementation was  
124 interrupted by the COVID-19 pandemic, followed by a substantial increase in this value  
125 in 2021.

126 In addition to analyzing MRV records, we present case studies of five shipping  
127 companies: Mediterranean Shipping Company S.A. (MSC), Maersk, Hapag-Lloyd AG  
128 (HL), CMA CGM, and Hafnia Limited (Hafnia). Using the Wilcoxon signed-rank test,  
129 the results show that the technical measures implemented by the MSC, Maersk, and  
130 CMA CGM result in a significant decrease in their fleets' annual average CO<sub>2</sub>  
131 emissions per distance from 2018 to 2019. However, the annual average CO<sub>2</sub> emissions

132 per distance for MSC, CMA CGM, Maersk, and HL increase substantially in 2021. This  
133 shift is attributed to vessels' longer port calls and delays caused by disruptions to the  
134 global supply chain by the COVID-19 pandemic, as ships had to travel at higher speeds  
135 to meet the increasing demand for seaborne cargo in 2021. In contrast, Hafnia's annual  
136 average CO<sub>2</sub> emissions per distance do not significantly change in 2021, because Hafnia  
137 mainly operates oil and chemical tankers, which are less susceptible to disruptions.

138 Finally, this study provides three policy recommendations and management  
139 strategies to promote a more sustainable shipping industry in the EU. These  
140 recommendations include facilitating collaboration and knowledge sharing among  
141 industry stakeholders, investing in green shipping infrastructure development, and  
142 offering incentives to encourage the adoption of more accurate fuel consumption and  
143 emissions monitoring methods. These measures can help to improve data reliability,  
144 environmental performance, and regulatory oversight in the shipping industry,  
145 ultimately leading to greater sustainability.

## 146 **2. Literature Review**

147 The MRV system is a key measure implemented by the EU to tackle GHG  
148 emissions from maritime transport (Psaraftis and Woodall, 2019). The system requires  
149 ship owners to monitor, report, and verify their ships' CO<sub>2</sub> emissions, with the aim of  
150 providing accurate information on emissions and incentivizing energy efficiency  
151 improvements (Panagakos et al., 2019). In this study, we divide the relevant literature  
152 into two categories: qualitative and quantitative. The qualitative literature has mainly  
153 discussed the potential impacts of implementing the MRV system on the shipping  
154 industry and examines the technical details of the MRV system. Akoel and Miler (2019)  
155 examined the MRV system's economic and operational effects on maritime transport,  
156 asserting that the MRV system is a cost-effective and environmentally efficient policy.  
157 Nelissen and Faber (2014) discussed the costs related to the deployment of the MRV  
158 system and estimated that the MRV system could reduce CO<sub>2</sub> emissions by at least 2%  
159 by 2030. Wang et al. (2020) highlighted three advantages of the MRV system:  
160 encouraging the use of fuel-efficient ships, incentivizing investments in emissions  
161 reduction technologies, and enabling ship owners to improve the efficiency of ship  
162 operations according to historical data. Additionally, some research has focused on the  
163 technical details of the MRV system. Sanabra and Borén (2020) explored 11 techniques  
164 to calculate ship emissions, dividing them into theory-based methods (TBMs) and ship-  
165 based methods (SBMs). TBMs cannot achieve MRV monitoring; SBMs comply with

166 the MRV specifications, but some of the SBMs methods require greater onboard  
167 investment. Faber et al. (2013) compared four CO<sub>2</sub> emissions monitoring methods  
168 adopted in the MRV system in terms of equipment needs, costs, monitoring quality,  
169 and resulting emissions reduction incentives.

170 The quantitative literature has evaluated the effect of implementing the MRV  
171 system or analyzed the status of ship CO<sub>2</sub> emissions based on the emission reports  
172 issued by the MRV system. Based on data collected through a questionnaire completed  
173 by maritime experts, Rony et al. (2019) examined the effect of implementing the MRV  
174 system on current energy efficiency practices in the maritime industry. The authors also  
175 identified the potential challenges related to the robustness and quality of the data  
176 collected. Panagakos et al. (2019) evaluated the MRV regulations by computing energy  
177 efficiency indicators using operational data from 1,041 dry bulk carriers, revealing that  
178 the MRV system's geographical coverage limitations lead to considerable bias and  
179 hinder decision-making. Mannarini et al. (2020) augmented the CO<sub>2</sub> emissions data  
180 obtained from the MRV system for Ro-Pax vessels with three additional databases and  
181 assigned geographical coordinates to each vessel. Based on the augmented dataset, they  
182 analyzed various energy efficiency indicators for different vessel clusters and identified  
183 continental patterns in Ro-Pax emissions. Moreover, Mannarini et al. (2022) examined  
184 the effects of the COVID-19 pandemic on shipping emissions in Europe by utilizing  
185 both port call data and CO<sub>2</sub> emissions data of ferries in the MRV system. Their study  
186 found that unitary emissions decreased in 2020, and greater reductions were observed  
187 for older and larger ferries. Yan et al. (2023) compared the MRV data obtained in 2018  
188 and 2019 and developed a prediction method based on gradient boosting regression tree  
189 (GBRT) to predict annual average fuel consumption by ship type. They also mentioned  
190 that other machine learning methods, such as neural network models (Stamenkovic and  
191 Vladimir, 2015), can be implemented for obtaining more accurate predictions in such  
192 tasks. In addition, the European Commission's annual report presents the ship basic  
193 information, sailing voyage information, and technical energy efficiency of fleets  
194 monitored in 2018 and 2019 based on MRV records (European Commission, 2021).

195 Based on the above, the qualitative literature on the EU MRV system has provided  
196 comprehensive analyses of the impacts of MRV implementation on the shipping  
197 industry, and some studies have explored the technical details of MRV. A few  
198 quantitative studies have analyzed the annual emission reports provided by the MRV  
199 system. These studies have mostly examined a single type of ship (Ro-Pax vessels or

200 ferries) based on a single year's MRV data. To the best of our knowledge, only Yan et  
201 al. (2023) and the annual report of the European Commission (European Commission,  
202 2021) compared two years of MRV data and thoroughly analyzed the key parameters  
203 of MRV records. However, the MRV mechanism has been operating for five years, and  
204 four years of MRV data have been accumulated as of May 2023. Few studies have  
205 investigated the temporal trends of key parameters in MRV reports. Furthermore, few  
206 studies have assessed the emission performance of shipping companies during the  
207 MRV implementation period. To address these gaps, we analyze the annual trends of  
208 MRV data based on MRV reports collected from 2018 to 2021. Then, we adopt the  
209 Wilcoxon signed-rank test to examine the differences in annual CO<sub>2</sub> emissions per  
210 distance for five shipping companies over two consecutive years. Finally, based on the  
211 findings, we provide some policy recommendations and management strategies to  
212 improve the MRV system and facilitate the decarbonization of the shipping industry.

### 213 **3. Analysis of trends in ship-related features in the MRV system**

214 As of 2018, all ships that call at any EU port must submit an annually aggregated  
215 emission report, which can be downloaded through a dedicated system named THETIS-  
216 MRV<sup>2</sup>, supported by the EMSA. The data collected from the annual emission reports  
217 of the previous year are made available to the public no later than July 1 of the current  
218 year. The MRV data of 2018 were first released on June 30 2019, and four years of  
219 MRV data have been collected as of May 2023. In each year from 2018 to 2021, a total  
220 of 12,155, 12,134, 12,045, and 12,213 ships, respectively, submitted annual reports to  
221 the MRV system. Based on the four-year data, we analyze the annual trends in MRV  
222 records in terms of three aspects: the ship's basic profile, its emissions monitoring  
223 methods and results, and its energy efficiency.

#### 224 **3.1 Analysis of trends in ship's basic information in the MRV system**

225 In the analysis of trends in ship's basic information, two factors, namely ship type  
226 and ship flag state, are taken into consideration. We first plot the types of vessels  
227 visiting EU ports from 2018 to 2021, as shown in Figure 1. As can be seen, 15 types of  
228 ships report their emissions to the EU MRV system, and the top five ship types are the  
229 same across all years: bulk carriers, oil tankers, container ships, chemical tankers, and  
230 general cargo ships.

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<sup>2</sup> <https://mrv.emsa.europa.eu/#public/emission-report>.

231 Furthermore, this research examines the MRV data obtained from 2018 to 2021, a  
 232 period that includes the COVID-19 pandemic (from the end of 2019 to 2021). Therefore,  
 233 we calculate the percentage decline in the number of ships of all types calling at EU  
 234 ports in 2020 compared with 2019, as shown in Figure 1.1. This allows us to identify  
 235 the trends and patterns in the number of ships of different types. According to the  
 236 EMSA (2021), the COVID-19 pandemic severely impacted global shipping, with  
 237 restrictions on passenger and crew movement hindering the operation of passenger  
 238 ships. According to Figure 1.1 (which is located at the upper-right corner of Figure 1),  
 239 the types of ships most affected in terms of the reduction in the number of visits are  
 240 passenger ships, roll-on/roll-off (Ro-Ro) ships, container ships, and bulk carriers. This  
 241 finding is in line with the EMSA’s conclusion. It also indicates that the pandemic more  
 242 strongly affected passenger ships than cargo ships.

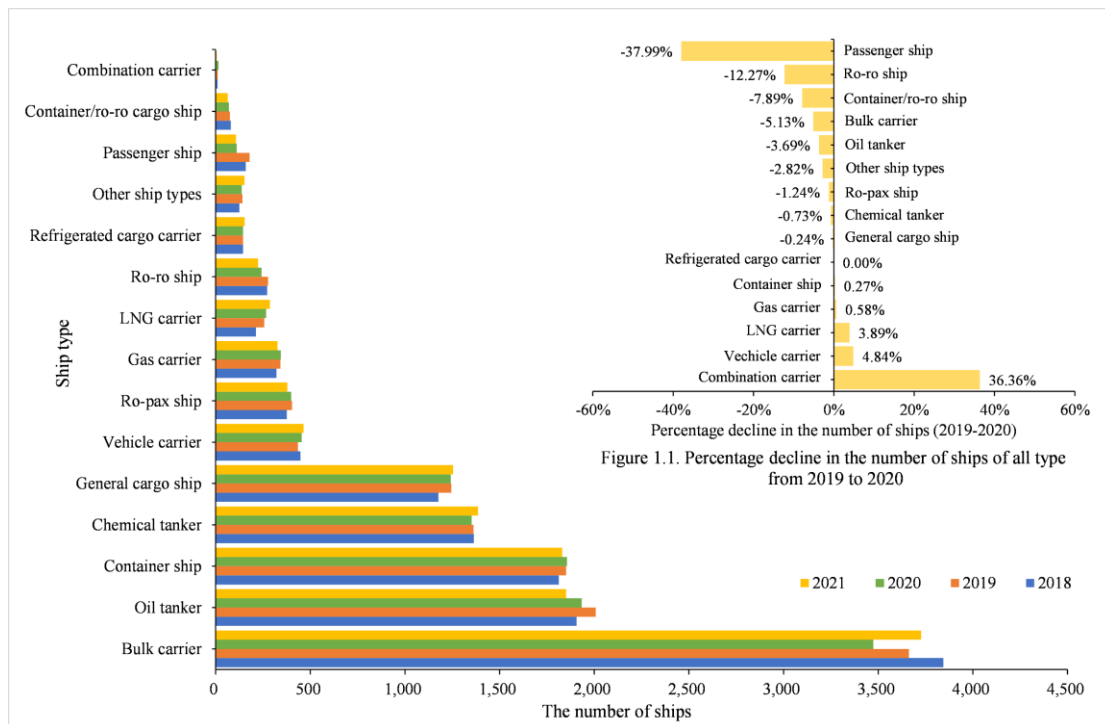
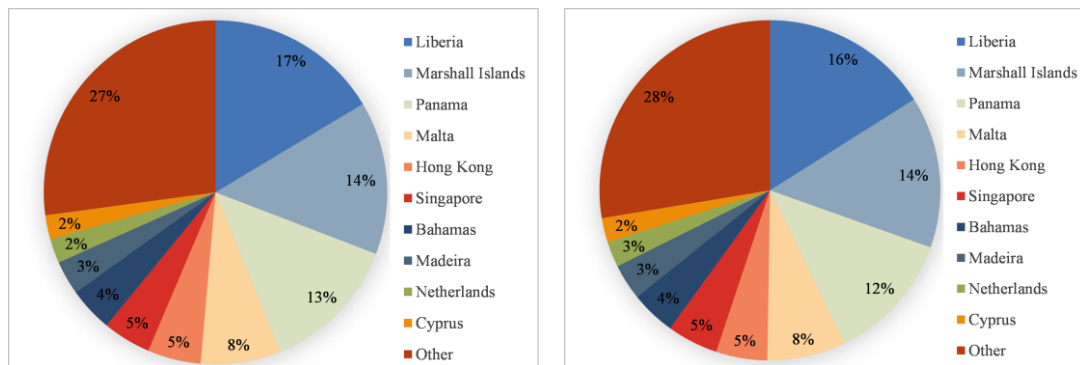


Figure 1. The ship type reported to the MRV regime

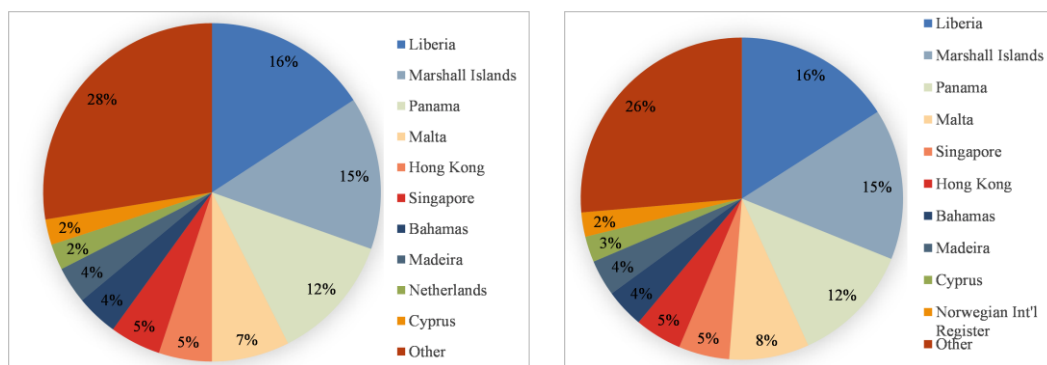
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 245 Before analyzing the flag states of the ships recorded in the MRV system from  
 246 2018 to 2021, we first search for the flag state of each vessel in the MRV system based  
 247 on their IMO number, obtained from the Shipping Intelligence Network<sup>3</sup>. Then, we  
 248 determine the 10 flag states with the highest number of ships recorded in the MRV  
 249 system from 2018 to 2021, and the results are shown in Figure 2. During this period,  
 250 the top eight flag states remain unchanged; they are Libera, the Marshall Islands,

<sup>3</sup> <https://www.clarksons.net/>.

251 Panama, Malta, Hong Kong, Singapore, the Bahamas, and Madeira. The two lowest-  
 252 ranked flag states from 2018 to 2020 are the Netherlands and Cyprus; however, in 2021,  
 253 they are replaced by Cyprus and the Norway International Register (Norway).



(a) The distribution of ship flag states in 2018 (b) The distribution of ship flag states in 2019

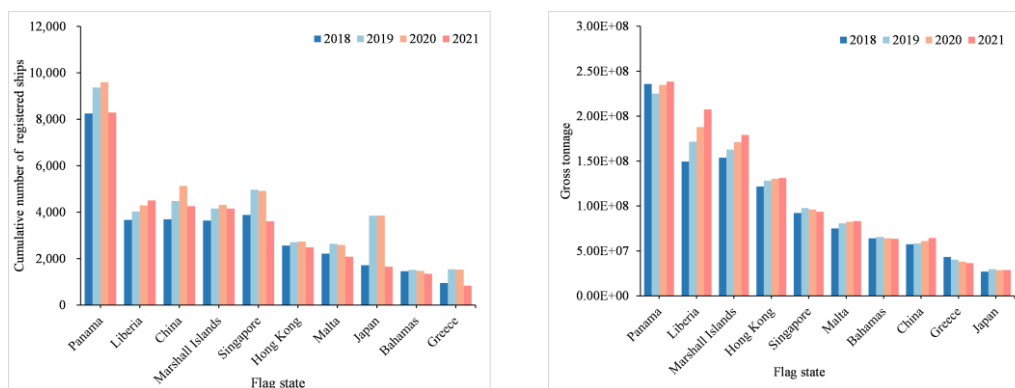


(c) The distribution of ship flag states in 2020 (d) The distribution of ship flag states in 2021

254 Figure 2. The distribution of ship flag states from 2018 to 2021

255 Furthermore, Lloyd’s List Intelligence provides the top 10 flag states in terms of  
 256 the total number of registered vessels (above 500 gross tonnage) on an annual basis  
 257 from 2018 to 2021 (Lloyd’s List, 2018, 2019, 2020, and 2021), as shown in Figure 3(a).  
 258 In terms of the number of vessels recorded in the MRV system, most of the flag states  
 259 in the top eight belong to the 10 flag states described above. However, although China,  
 260 Japan, and Greece are ranked third, eighth, and tenth, respectively, in terms of the  
 261 number of registered ships, they do not appear in the top 10 flag states in Figure 2.  
 262 Although China, Japan, and Greece register more ships than some of the top 10 flag  
 263 states (Figure 3(a)), such as Malta, the Bahamas, and Singapore, the gross tonnage of  
 264 ships registered under these three flags is lower than that of ships registered for Malta,  
 265 the Bahamas, and Singapore, as shown in Figure 3(b). Therefore, the number of ships  
 266 over 5,000 gross tonnage in these countries is lower than in some of the top 10 countries

267 listed in Figure 2. As the MRV system only collects emission reports from ships with a  
 268 total tonnage exceeding 5,000, the number of ships reported by China, Greece, and  
 269 Japan in the MRV system is not shown in Figure 2. In addition, Madeira, the  
 270 Netherlands, Norway, and Cyprus report many vessels to the MRV, but these flag states  
 271 are not ranked among the top 10 in Figure 3. The reason may be that these countries are  
 272 within the EU and thus trade frequently with other member states; ships registered in  
 273 these countries frequently call at EU ports and are thus recorded in the MRV system.



(a) Top 10 flag states in terms of the number of registered vessels

(b) Top 10 flag states in terms of the registered vessels' gross tonnage

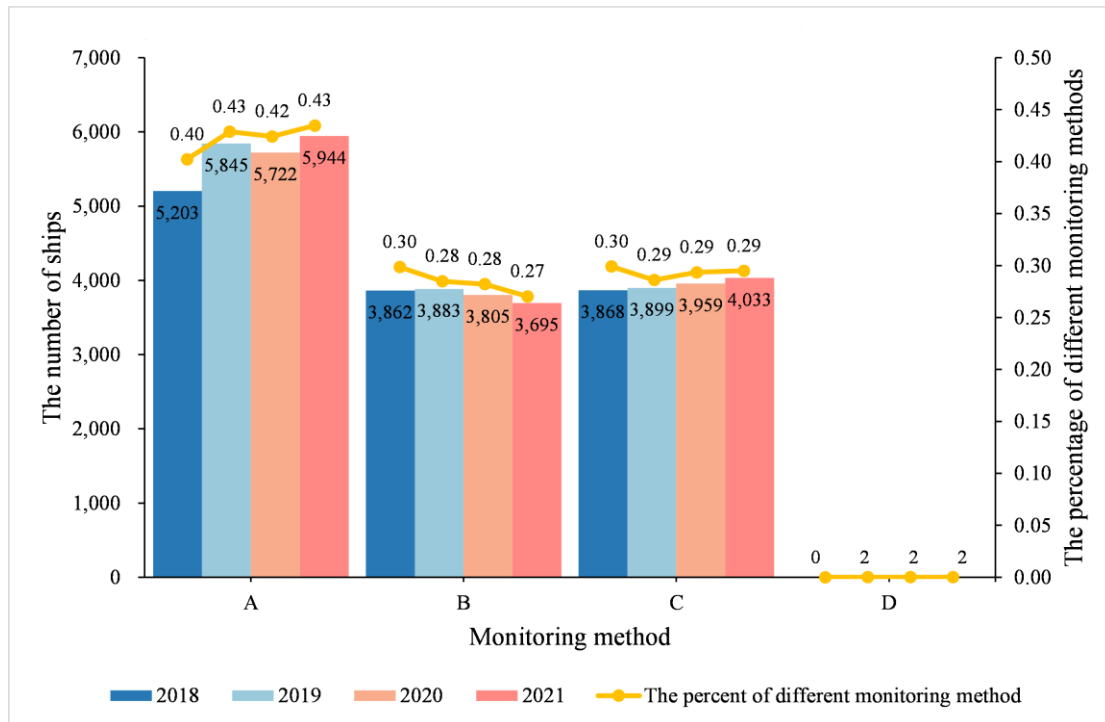
274 Figure 3. Top 10 flag states by vessel count and gross tonnage from 2018 to 2021

### 275 3.2 Analysis of trends in ship emissions monitoring methods and results

276 We then analyze the trends in ship emissions monitoring methods and results.  
 277 There are four monitoring methods currently available in the MRV system, namely (A)  
 278 bunker fuel delivery note (BDN) and the periodic stocktakes of fuel tank; (B) bunker  
 279 fuel tank monitoring on board; (C) flow meters for applicable combustion processes;  
 280 and (D) direct CO<sub>2</sub> emissions measurements. Shipping companies can choose one or a  
 281 combination of these monitoring methods to calculate each vessel's fuel consumption  
 282 or CO<sub>2</sub> emissions.

283 The number and percentage of ships adopting each monitoring method from 2018  
 284 to 2021 are shown in Figure 4. The percentage of ships adopting method A remains  
 285 above 40% from 2018 to 2021; due to this method's simplicity and cost-effectiveness,  
 286 it is easily implemented by shipping companies. The percentage of ships adopting  
 287 methods B and C is similar, and there is no significant change in the ratio of ships  
 288 adopting these methods from 2018 to 2021. The reason for this finding may be that  
 289 methods B and C can generate more accurate and detailed fuel consumption and  
 290 emissions data than method A, but they may also be more expensive and complex to

291 implement. In addition, method C is only applicable to vessels equipped with flow  
 292 meters to monitor their combustion processes, and its implementation may not be  
 293 feasible or cost-effective for all shipping companies. The number of ships using method  
 294 D remains very low from 2018 to 2021, because method D is the most expensive to  
 295 implement; indeed, it involves installing a continuous emissions monitoring system  
 296 (CEMS) onboard to directly measure CO<sub>2</sub> emissions from the engine's exhaust gases  
 297 (Faber, 2013).



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Figure 4. The distribution of ship monitoring methods from 2018 to 2021

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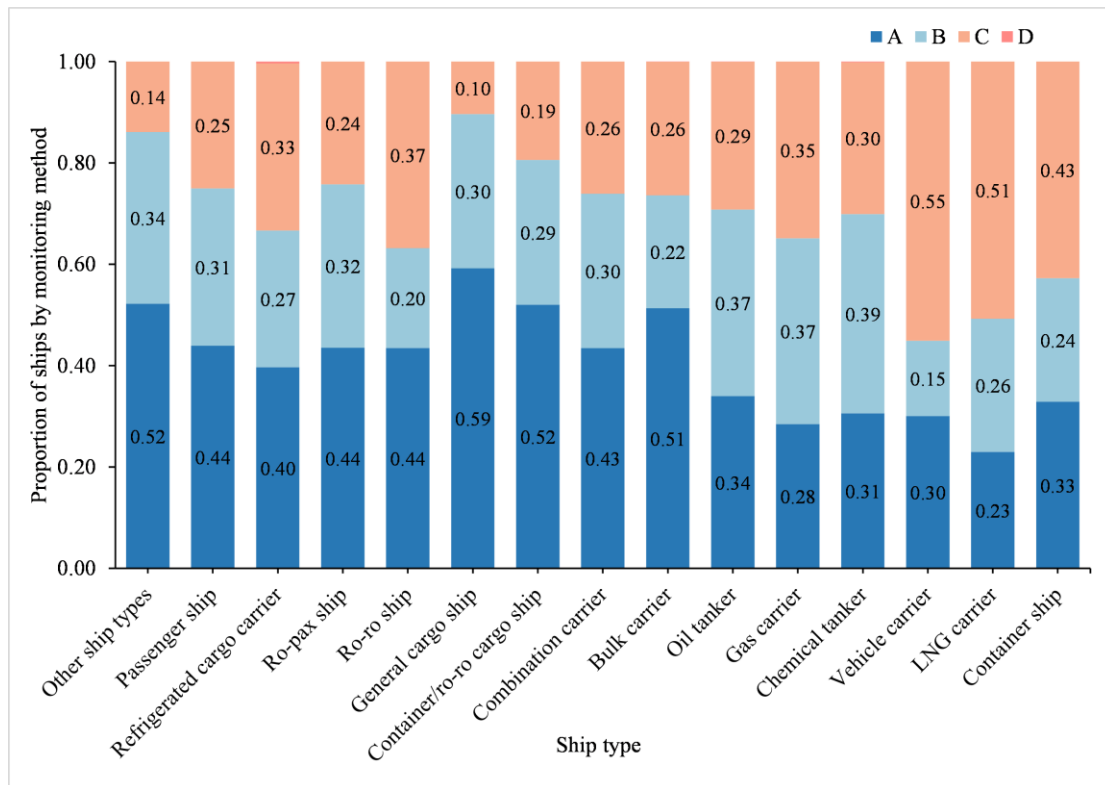
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To further examine the usage of different monitoring methods across different types of ships, we aggregate the ship data recorded in the MRV system from 2018 to 2021 and calculate the proportion of each type of ship using the different monitoring methods, as shown in Figure 5. We find that passenger ships, refrigerated cargo carriers, Ro-Pax ships, Ro-Ro ships, general cargo ships, container/Ro-Ro cargo ships, and combination carriers tend to use method A. Oil tankers, gas carriers, and vehicle carriers tend to use method B, while vehicle carriers, liquefied natural gas (LNG) carriers, and container ships tend to use method C.

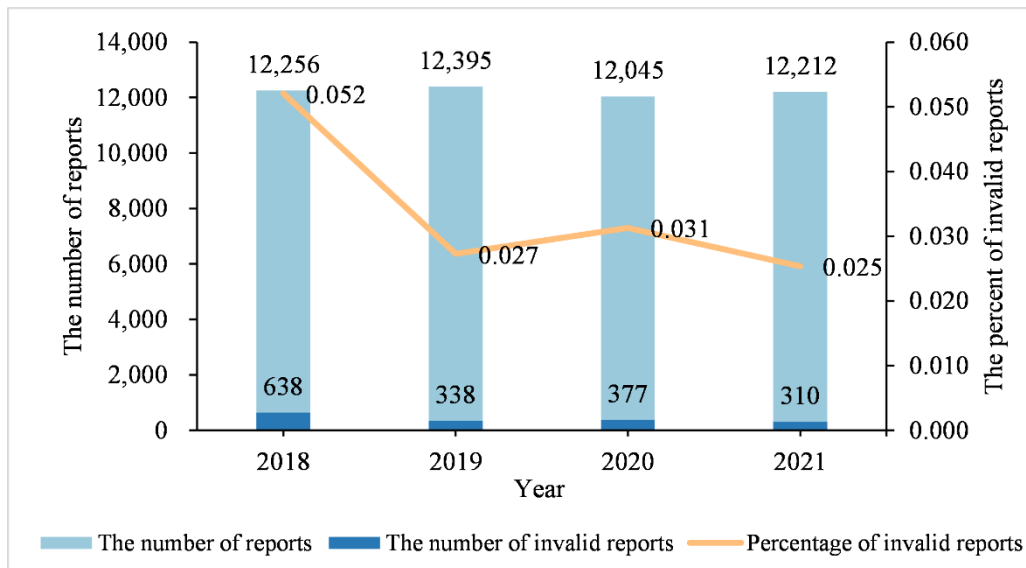


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309 Figure 5. The distribution of monitoring methods used by ships of different types

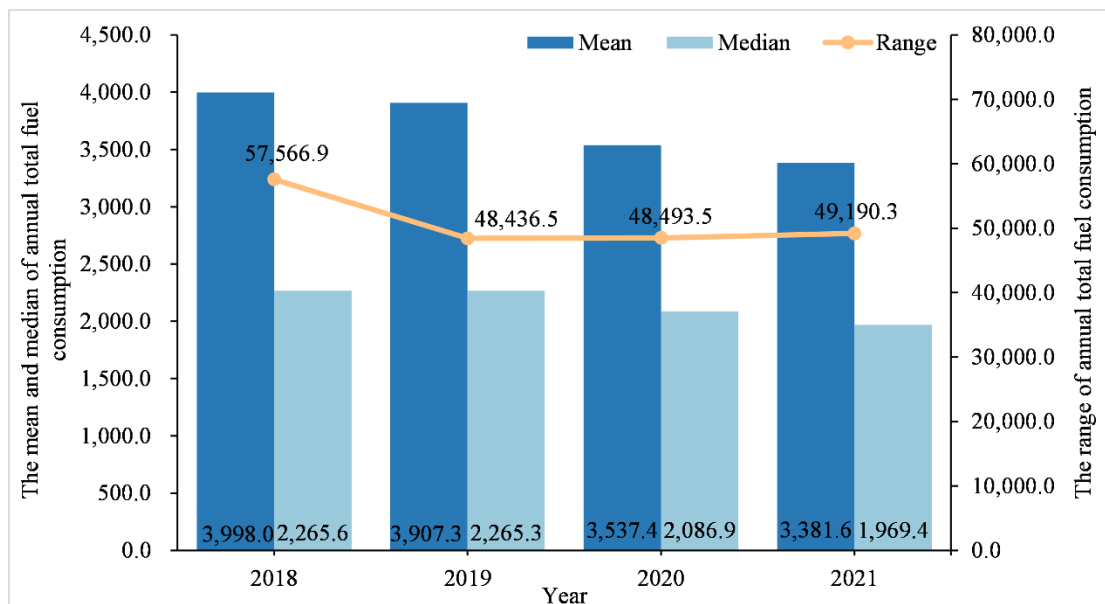
310 In each year's MRV data, there are a small number of reports with zero annual  
 311 total fuel consumption and zero total CO<sub>2</sub> emissions, which are outliers and are thus  
 312 invalid. Figure 6 presents the number and percentage of invalid reports in each year's  
 313 MRV data. It can be observed that the percentage of invalid reports decreases from  
 314 2018 to 2021, with a notable drop from 5.2% in 2018 to 2.7% in 2019, indicating that  
 315 the quality of the MRV data is constantly improving. After removing all invalid reports  
 316 and those with an abnormal magnitude<sup>4</sup> from the raw MRV data, the mean, median,  
 317 and range of annual total fuel consumption are calculated, as shown in Figure 7. The  
 318 mean and median values show a decline from 2018 to 2021. Moreover, the range value  
 319 decreases from 57,566.9 mt in 2018 to 48,436.5 mt in 2019 and remains stable  
 320 thereafter. This indicates a reduction in the differences in annual total fuel consumption  
 321 among ships.

<sup>4</sup> In the 2018 MRV data, one ship reported an annual total fuel consumption of 98,465.2 mt, making it the ship with the highest annual total fuel consumption in 2018. This ship consumed 40,889.84 mt more fuel than the ship with the second-highest fuel consumption in 2018, and its fuel consumption was also much higher than that of other ships with the highest annual total fuel consumption in 2019, 2020, and 2021. Therefore, the annual total fuel consumption of this ship is considered to be of an abnormal magnitude and is removed before calculating the median, mean, and range.



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Figure 6. The number and percentage of invalid reports in the MRV regime from 2018 to 2021



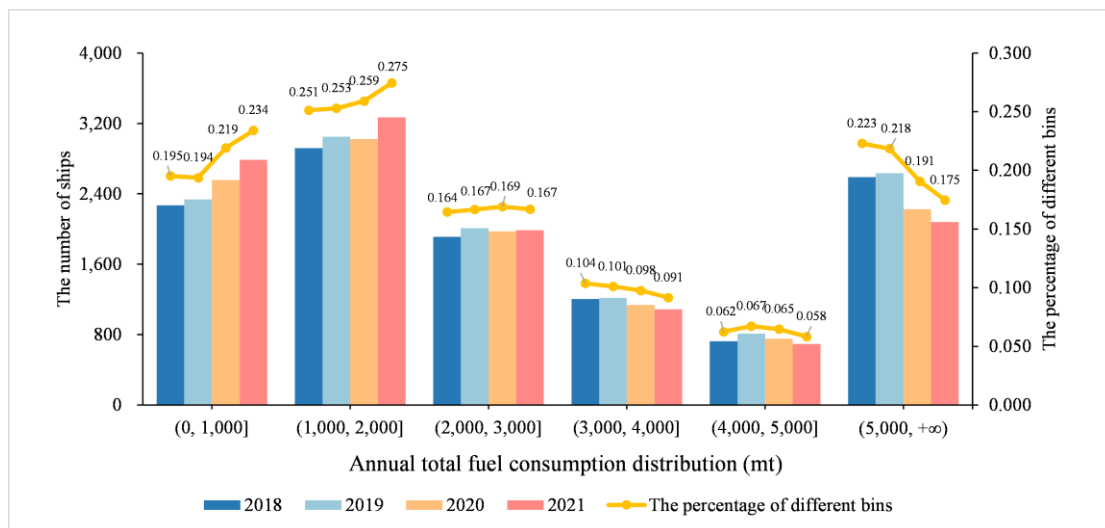
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Figure 7. The mean, median, and range of annual total fuel consumption from 2018 to 2021

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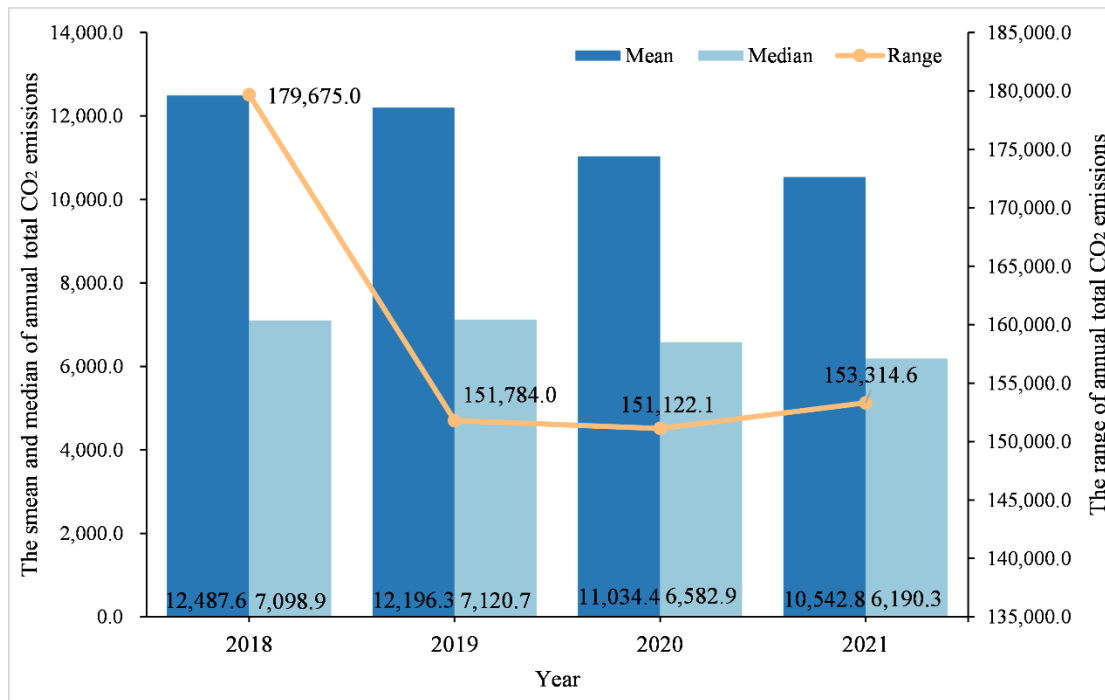
To gain a more comprehensive understanding of the annual total fuel consumption of ships, the total fuel consumption of each year is divided into multiple bins; we count the number of ships and calculate their percentage in each bin. The results are shown in Figure 8. It can be observed that the ships within different bins exhibit varying trends in annual total fuel consumption over time. First, the annual total fuel consumption of approximately 50% of the ships is less than 2,000 mt from 2018 to 2021. This percentage increases significantly over time, reaching 50.9% in 2021. Second, the annual total fuel consumption of less than 20% of the ships is between 2,000 mt and

336 3,000 mt during the studied period, with the percentage slowly increasing from 2018 to  
 337 2020, before returning to the 2019 level in 2021. Third, the percentage of ships in the  
 338 (3,000, 4,000] and (4,000, 5,000] bins slowly decrease each year, with the percentage  
 339 of ships in the (3,000, 4,000] bin not exceeding 12% and the percentage in the (4,000,  
 340 5,000] bin not exceeding 7% from 2018 to 2021. Last, the percentage of ships with  
 341 annual total fuel consumption above 5,000 mt decreases yearly, falling below 20% in  
 342 2020. This decline can be attributed to the fact that fuel costs constitute a major  
 343 proportion of a vessel's overall operating costs. In fact, fuel costs typically between 30%  
 344 and 60% of a vessel's overall operating costs (Lashgari et al., 2021). As a result, ship  
 345 operators must carefully plan their fleets' fuel consumption to reduce their operating  
 346 costs, especially when fuel prices are high.



347  
 348 Figure 8. The distribution of annual total fuel consumption from 2018 to 2021

349 In line with the strong correlation between annual total CO<sub>2</sub> emissions and annual  
 350 total fuel consumption, we observe a decrease in the mean and median values of annual  
 351 total CO<sub>2</sub> emissions from 2018 to 2021, as illustrated in Figure 9. Furthermore, the  
 352 range value decreases from 179,675.7 mt in 2018 to 151,784.0 mt in 2019, and remains  
 353 stable thereafter.



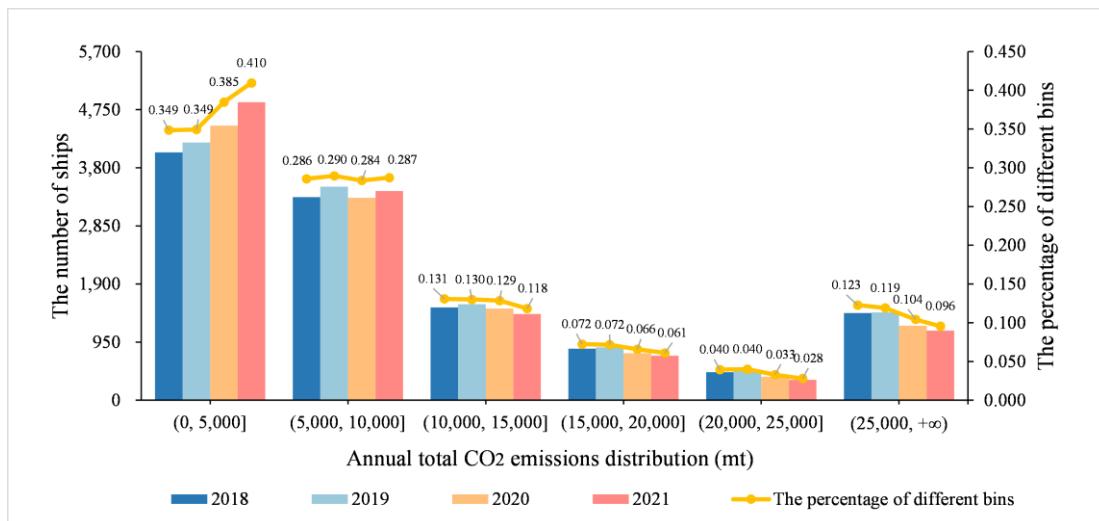
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355 Figure 9. The mean, median, and range of annual CO<sub>2</sub> emissions from 2018 to 2021

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357 Furthermore, ships are categorized into six bins in terms of their annual total CO<sub>2</sub>  
 358 emissions, as illustrated in Figure 10. This shows that the annual total CO<sub>2</sub> emissions  
 359 of over 60% of the ships recorded in the MRV system are below 10,000 mt, and this  
 360 percentage increases annually, finally reaching 69.7% in 2021. Meanwhile, the ships in  
 361 the (10,000, 15,000], (15,000, 20,000], and (20,000, 25,000] bins exhibit slow  
 362 downward trends in annual total fuel consumption over time. Over 10% of the vessels  
 363 produce over 25,000 mt of CO<sub>2</sub> per year from 2018 to 2020, and this percentage  
 364 significantly decreases annually, reaching 9.6% in 2021. This phenomenon might be  
 365 associated with the increasingly stringent emissions requirements set by the IMO. In  
 366 2018, the IMO set the goal to reduce GHG emissions from global shipping by a  
 367 minimum of 50% by 2050, compared with 2008 levels. Additionally, it aims to reduce  
 368 carbon intensity by a minimum of 40% by 2030 (IMO, 2020). To achieve these targets,  
 369 the IMO has introduced short-term measures, including the Energy Efficiency Existing  
 370 Ship Index (EEXI); for ships built before 2013 and exceeding 400 gross tonnage, ship  
 371 owners must achieve a satisfactory EEXI value by 2023 (IMO, 2021a; Schroer et al.,  
 372 2022). The Carbon Intensity Indicator (CII) applies to all Ro-Pax, cargo, and cruise  
 373 ships; each ship must calculate and report its CII rating every year starting from 2023  
 374 (IMO, 2021b). Ships must achieve a C rating or above, and those that receive a D rating  
 375 for three consecutive years or an E rating in any single year must submit a corrective  
 action plan to be approved. Therefore, to comply with these regulations, shipping

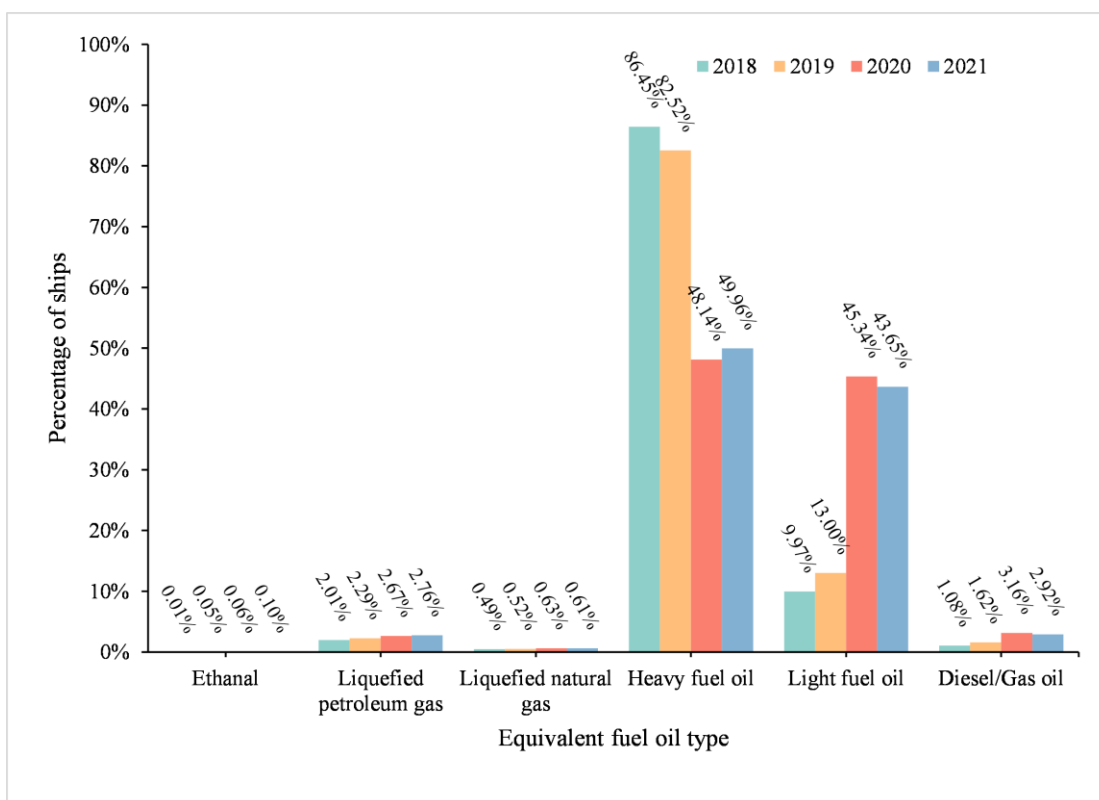
376 companies must take measures to improve their energy efficiency, such as retrofitting  
 377 vessels with more efficient engines, optimizing propellers, and optimizing speeds and  
 378 routes, and must consider using alternative fuels such as LNG to reduce their CO<sub>2</sub>  
 379 emissions (Ančić et al., 2020).



380

381

Figure 10. The distribution of annual total CO<sub>2</sub> emissions from 2018 to 2021



382

383

Figure 11. The distribution of equivalent fuel type consumed by ships

384

385

386

According to each ship's annual total fuel consumption and CO<sub>2</sub> emissions, we further compute the CO<sub>2</sub> emissions produced by each unit of fuel consumed. This value is referred to as the carbon ratio of the ship. As shown in Table 1, different fuels have

387 different emissions factors (i.e., the amount of carbon emissions generated by each unit  
388 of energy consumed or used) due to differences in their chemical compositions and  
389 combustion properties, so we can estimate the emissions factors of a ship based on the  
390 carbon ratio calculated. As ships use different types of fuels for different activities, the  
391 carbon ratio is not equal to a certain emissions factor; it is only an estimate of the  
392 emissions factor. Therefore, to infer the type of fuel used by a ship, we generate ranges  
393 for the carbon ratio. We can determine the equivalent fuel type used by the ship  
394 according to the range within which its carbon ratio falls, referring to Table 1. For  
395 example, when the carbon ratio falls within the interval  $3.114, 3.151$ , we can conclude  
396 that the ship uses heavy fuel oil. We plot the distribution of equivalent fuel oil types  
397 used from 2018 to 2021 in Figure 11. Over 90% of the vessels use light fuel oil and  
398 heavy fuel oil during this period, while the percentages of vessels that use other types  
399 of fuels are relatively small. Indeed, light fuel oil and heavy fuel oil are relatively cheap  
400 compared with other types of fuel oil. In addition, the adoption of cleaner fuels, such  
401 as LNG, ethanal, and liquefied petroleum, is restricted by factors such as the availability  
402 of infrastructure and the high costs of retrofitting or building new ships with engines  
403 that use these fuels (American Bureau of Shipping, 2020). For example, the availability  
404 of LNG bunkering facilities is limited in many regions around the world. According to  
405 Statistic<sup>5</sup>, there were 23 ports offering LNG bunkering services in 2022, representing  
406 only 1.9% of over 1,200 seaports in the EU<sup>6</sup>. Furthermore, retrofitting a ship with an  
407 LNG propulsion system requires considerable modifications to the ship's existing  
408 system and its fuel storage facilities, costing tens of millions of dollars per vessel  
409 (Hapag-Lloyd AG, 2020).

410 It is worth noting that the percentage of vessels using heavy fuel oil significantly  
411 declines in 2020, while the percentage of vessels using light fuel oil sharply increases  
412 during the same period. In addition, the percentage of vessels that use clean-burning  
413 fuels, such as ethanal, liquefied petroleum gas, and diesel/gas oil, slowly increases from  
414 2018 to 2021. These shifts can be attributed to the implementation of IMO regulations  
415 in 2020, requiring the maximum fuel sulfur content used outside SECAs to be 0.5%  
416 m/m (IMO, 2016), modifying the previous limits of 0.1% m/m within SECAs and 3.5%  
417 m/m outside SECAs (IMO, 2008).

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<sup>5</sup> <https://www.statista.com/statistics/1103931/lng-bunkering-availability-in-ports-by-region/#statisticContainer>.

<sup>6</sup> [https://ec.europa.eu/commission/presscorner/detail/en/MEMO\\_13\\_448](https://ec.europa.eu/commission/presscorner/detail/en/MEMO_13_448).

Table 1. Calculation of equivalent fuel oil type

(Equivalent) fuel oil type	Emissions factor	The range of carbon ratio
Diesel/Gas oil	3.206	[3.206, +∞)
Light fuel oil	3.151	[3.151, 3.206)
Heavy fuel oil	3.114	[3.114, 3.151)
Liquefied petroleum gas	Propane: 3.000 Butane: 3.3030	[3.000, 3.114)
Liquefied natural gas	2.750	[2.750, 3.000)
Ethanol	1.913	[1.913, 2.750)

### 419 3.3 Analysis of trends in ship energy efficiency in the MRV system

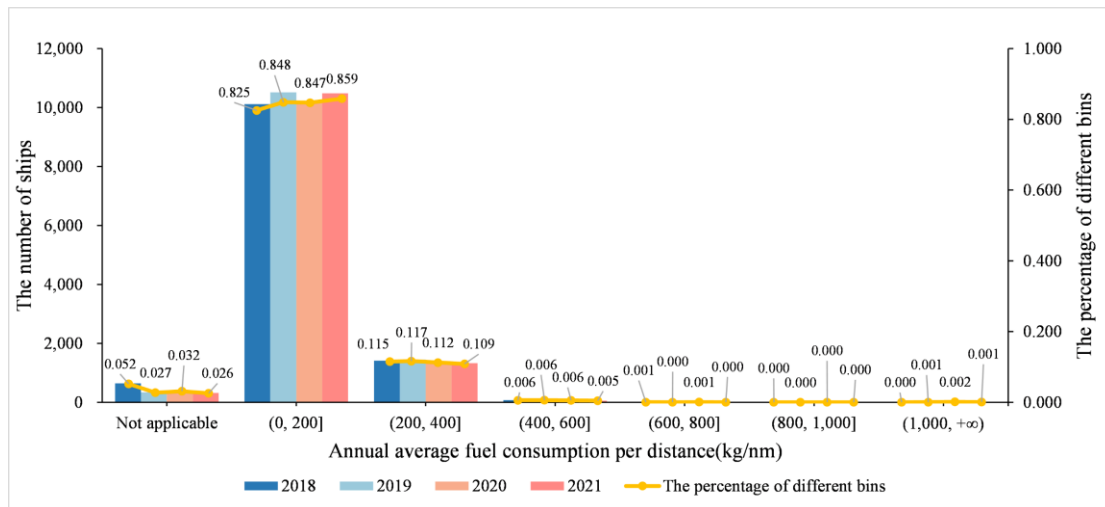
420 Based on the annual average fuel consumption per distance (FCD) per vessel from  
 421 2018 to 2021, ships are categorized into seven bins, as shown in Figure 12. If the annual  
 422 average FCD is listed as “divided by zero”<sup>7</sup>, such ships are placed in the “not applicable”  
 423 category. These ships gradually decrease from 2018 to 2021, indicating an  
 424 improvement in the quality of the MRV data over the years. After removing all invalid  
 425 values, the mean values of the annual average FCD from 2018 to 2021 are 137.02,  
 426 131.92, 132.43, and 187.92, respectively. The mean value decreases by 3.7% in 2019  
 427 but increases by 41.9% in 2021. This trend can be attributed to changes in sailing speed,  
 428 as the mean value of the annual average sailing speed<sup>8</sup> decreases from 11.02 to 10.96  
 429 in 2019 and increases from 11.85 to 12.03 in 2021. Furthermore, we find that EU ports  
 430 handle almost 3.5 billion metric tons of seaborne cargo in 2021, which is an increase of  
 431 more than 4% compared with the previous year<sup>9</sup>. With the disruption to the global  
 432 supply chain due to the COVID-19 pandemic, ships experienced longer port calls and  
 433 delays in 2021. Therefore, ships were required to travel at higher speeds to meet the  
 434 higher demand for seaborne cargo, resulting in an increase in the mean value of the  
 435 annual average FCD from 2020 to 2021. In addition, in our data, the average annual  
 436 fuel consumption of over 80% of the ships does not exceed 200 mt from 2018 to 2021,  
 437 and the percentage of such ships increases annually. The proportion of vessels with  
 438 average annual fuel consumption exceeding 400 mt is less than 1% during the same

<sup>7</sup> Ships that report the annual average FCD as “divided by zero” report their annual time spent at sea as zero, and most of these ships report their total fuel consumption as zero.

<sup>8</sup> The average annual sailing speed of the ship is calculated by dividing the total sailing distance (in nm) by the annual total time spent at sea (in hours), where the total sailing distance is calculated based on the annual average FCD (kg/nm) and the total fuel consumption (mt).

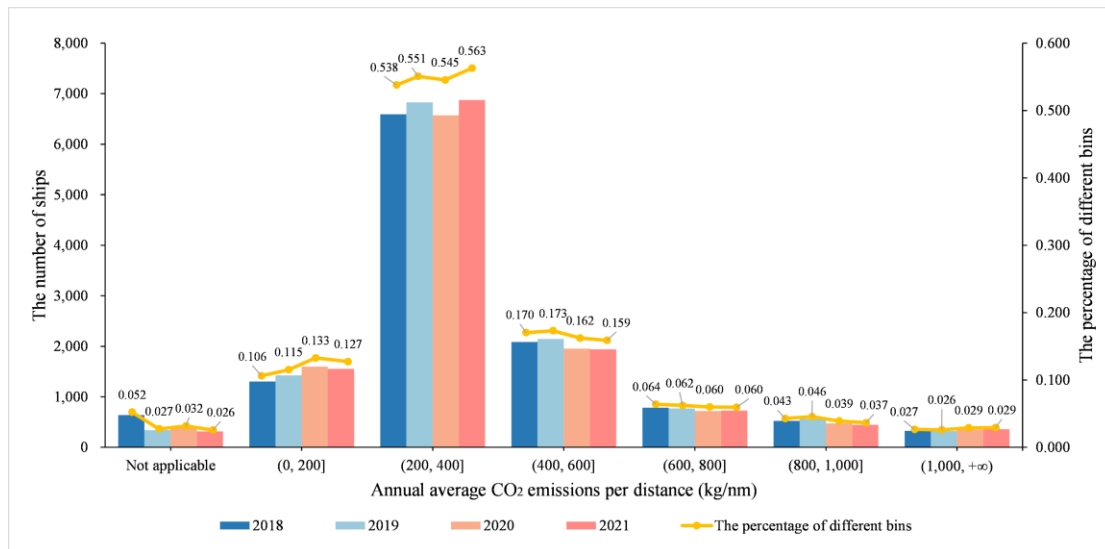
<sup>9</sup> <https://www.statista.com/statistics/1281738/gross-weight-seaborne-goods-european-union-ports/>.

439 period. This indicates that the shipping industry is beginning to adopt more fuel-  
 440 efficient practices.



441  
 442 Figure 12. The distribution of annual average fuel consumption from 2018 to 2021

443 Based on their annual average CO<sub>2</sub> emissions per distance, we divide ships into  
 444 seven bins, as shown in Figure 13. The variation in the number of ships whose values  
 445 are “divided by zero” follows the same pattern as that observed in the annual average  
 446 FCD. After removing all invalid values, the mean value of the annual average CO<sub>2</sub>  
 447 emissions per distance for 2018 to 2021 is 427.99, 412.36, 414.60, and 592.23,  
 448 respectively. The mean value of the annual average CO<sub>2</sub> emissions per distance  
 449 decreases by 3.7% in 2019 compared with 2018 but increases by 42.8% in 2021  
 450 compared with 2020. The trend in the mean value of the annual average CO<sub>2</sub> emissions  
 451 per distance is in line with the trend in the annual average FCD. This indicates that the  
 452 disruption caused by the COVID-19 pandemic interrupted the improvement in ships’  
 453 CO<sub>2</sub> emissions, resulting in a significant decrease in their emissions reduction  
 454 performance. In addition, from 2018 to 2021, over 80% of the ships have average  
 455 annual CO<sub>2</sub> emissions of less than 600 mt, and the percentage increases annually. The  
 456 percentage of ships with average annual fuel consumption exceeding 800 mt is below  
 457 10% during the same period. This indicates that ships using EU ports are navigating in  
 458 an increasingly eco-friendly mode, thus fostering sustainable development in the  
 459 shipping industry.



460

461 Figure 13. The distribution of annual average CO<sub>2</sub> emissions from 2018 to 2021

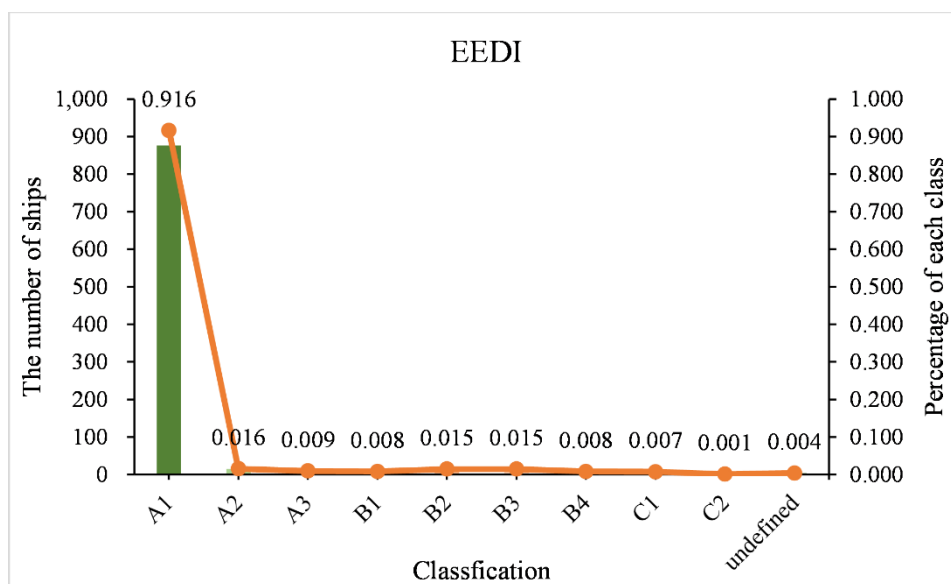
462

463 Finally, we examine the trends in ships' technical efficiency indicators as reported  
 464 in the MRV system. According to EU Regulation 2015/757 (EU, 2015), ships that call  
 465 at EU ports are required to monitor and report their technical efficiency indicators. In  
 466 general, ships must report their attained EEDI in compliance with the International  
 467 Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI. Certain  
 468 types of ships that fall beyond the scope of the EEDI report an estimated index value  
 469 (EIV) instead. To analyze the temporal characteristics of ship technical efficiency  
 470 indicators, we first filter ships that report the same indicators from 2018 to 2021 (i.e.,  
 471 those that report either the EEDI or EIV for all years between 2018 and 2021). In the  
 472 MRV data, there are 956 ships reporting their EEDI and 3,261 ships reporting their EIV  
 473 for the studied period.

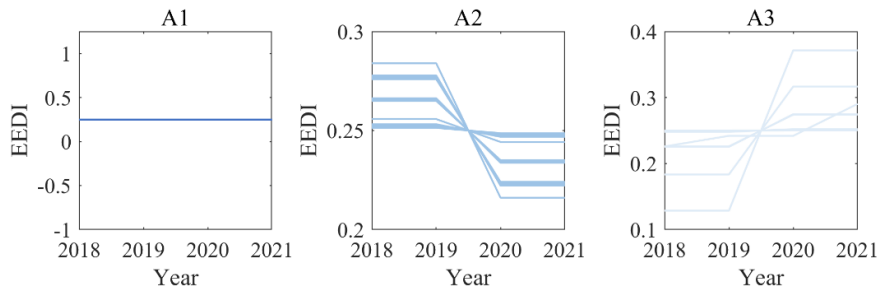
473

474 Based on the selected ships reporting the same indicator, we categorize the  
 475 temporal variations in technical efficiency into three types: stable trend, partial  
 476 variation, and continuous variation. The stable trend can be further divided into three  
 477 subcategories: no change, denoted by A1; a stable increase, denoted by A2; and a stable  
 478 decrease, denoted by A3. Partial variation can be further divided into four subcategories:  
 479 a decrease in the second year and stable thereafter, denoted by B1; an increase in the  
 480 second year and stable thereafter, denoted by B2; no change in the first three years and  
 481 a decrease in the fourth year, denoted by B3; and no change in the first three years and  
 482 an increase in the fourth year, denoted by B4. Continuous variation can be further  
 483 divided into two subcategories: first increasing and then decreasing, denoted by C1;  
 and first decreasing and then increasing, denoted by C2.

484 After classifying ships according to the time-varying characteristics of their EEDI,  
 485 the proportion of ships in each category is obtained, as shown in Figure 14. The  
 486 temporal trends of subcategories A1, A2, and A3, following a stable trend, are shown  
 487 in Figure 15(a); the temporal trends of subcategories B1, B2, B3, and B4, with partial  
 488 variation, are shown in Figure 15(b); the temporal trends of subcategories C1 and C2,  
 489 with continuous variation, are shown in Figure 15(c). The majority of ships (92%) are  
 490 classified as A1, meaning that there is no change in the EEDI of most ships from 2018  
 491 to 2021. The reason for this finding is that the EEDI of a ship is determined by its design  
 492 parameters and its use of energy-efficient technologies (IMO, 2018b), which are  
 493 relatively fixed over a short period. In addition, retrofitting a ship with new, energy-  
 494 efficient technologies or implementing design changes can be time-consuming and  
 495 costly and are thus limited. Therefore, the EEDI of most ships does not change  
 496 significantly over the studied period. For 4% of the ships, their EEDI shows a  
 497 decreasing trend from 2018 to 2021, including ships classified as A2, B1, and B3; 3%  
 498 of the ships show an increasing EEDI during the same period, including ships classified  
 499 as A3, B2, and B4. This means that a small percentage of ships may use new, energy-  
 500 efficient technologies or different designs to increase their technical efficiency, while a  
 501 few ships possess aging or malfunctioning equipment that is not properly maintained.

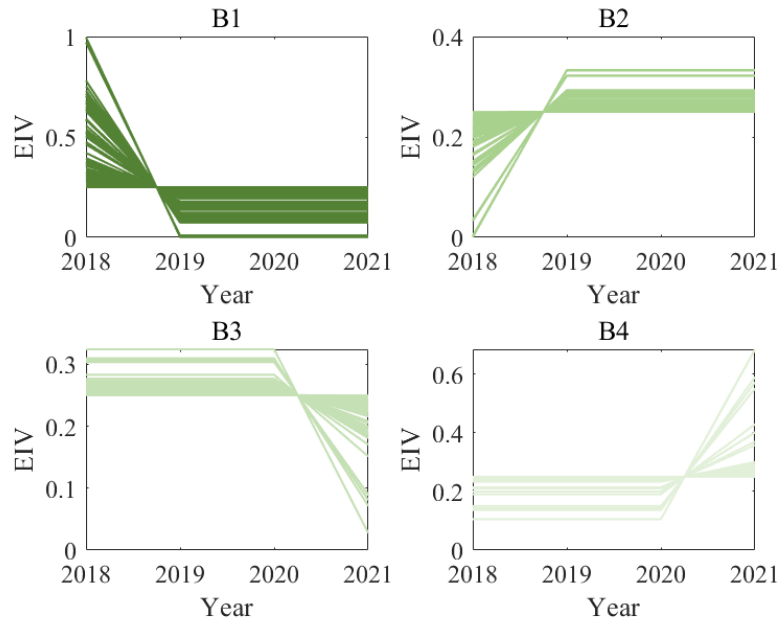


502 Figure 14. Classification results for ships reporting EEDI  
 503



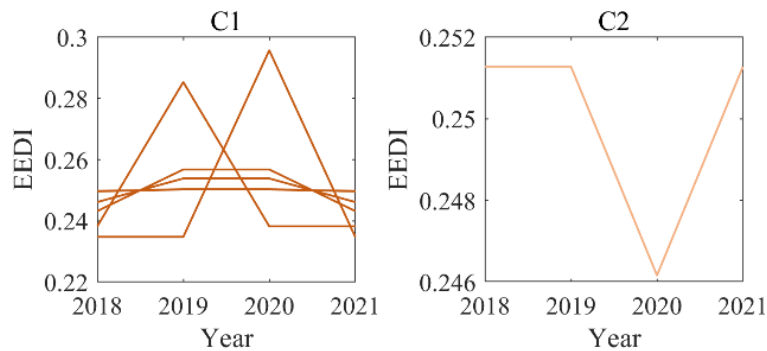
504  
505

(a) Steady trend



506  
507

(b) Partial variation



508  
509

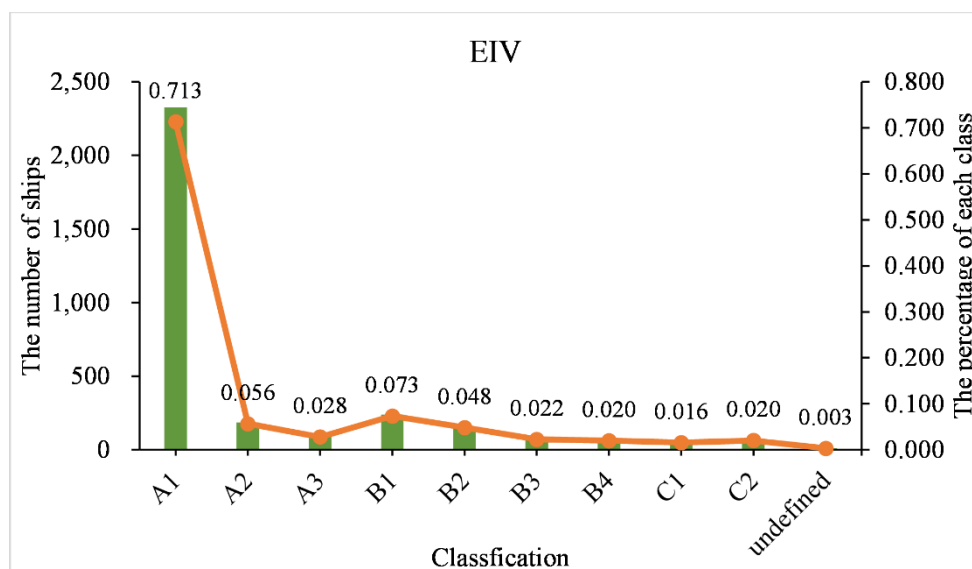
(c) Continuous variation

Figure 15. The temporal trend of EEDI reported by ships

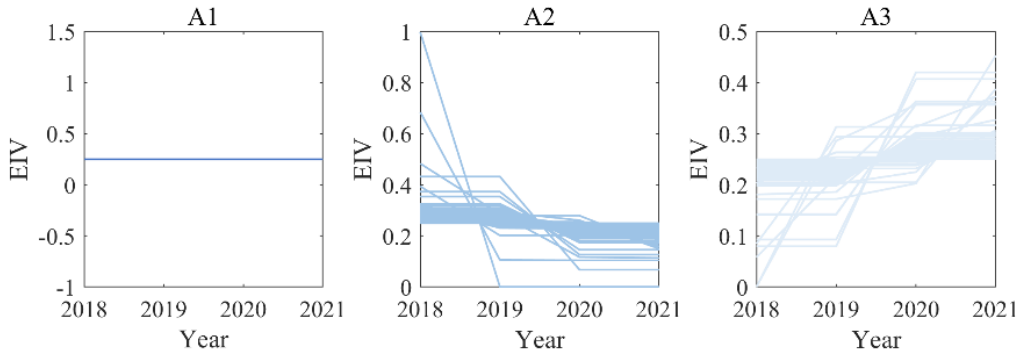
511 For ships reporting an EIV from 2018 to 2021, the proportion of ships in each  
512 category is shown in Figure 16. The temporal trends of the subcategories showing a  
513 stable trend, partial variation, and continuous variation are presented in Figure 17(a),  
514 17(b), and 17(c), respectively. The majority of ships (71%) are classified as A1. This  
515 means that the EIV of most ships remains unchanged from 2018 to 2021. In addition,

516 based on data from the Shipping Intelligence Network regarding the years in which  
 517 ships are built, ships reporting their EIV have an average age of 17 years, while those  
 518 reporting their EEDI have an average age of 7 years. This suggests that ships reporting  
 519 the EEDI are relatively modern, and their owners, operators, and managers have  
 520 invested extensively in their energy efficiency, leading to stable technical efficiency  
 521 indicators from 2018 to 2021; most of these ships are classified as A1. In contrast, ships  
 522 reporting the EIV are older and may have inferior operating conditions and maintenance  
 523 levels than more modern ships. The fluctuation in their technical efficiency indicators  
 524 may be more pronounced, and only 71% of these ships are classified as A1, which is  
 525 lower than the proportion of A1 ships reporting the EEDI.

526 Similar to the EEDI, the EIV only considers the design and specifications of the  
 527 ship and therefore does not change significantly in a short period, unless the ship is  
 528 retrofitted. Moreover, 15% of the vessels exhibit a decline in their EIV, including those  
 529 classified as A2, B1, and B3, which suggests that these ships have incorporated new,  
 530 energy-efficient technologies or design changes to enhance their technical efficiency.  
 531 Meanwhile, 7% of the vessels show an increase in their EIV, including those classified  
 532 as A3, B2, and B4, which can be attributed to aging or malfunctioning equipment  
 533 onboard.

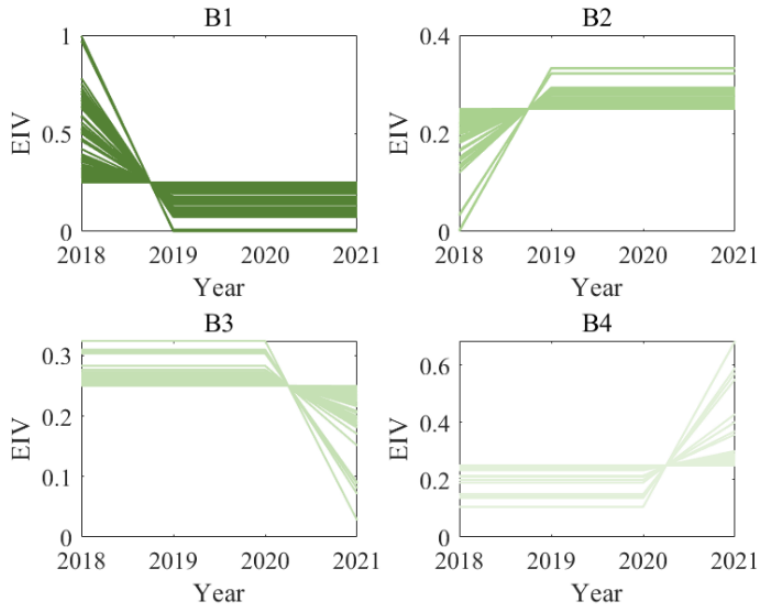


534 Figure 16. Classification results for ships reporting EIV  
 535  
 536



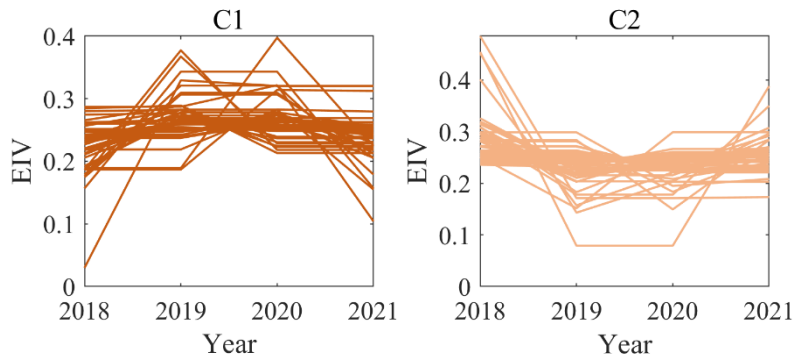
537  
538

(a) Steady trend



539  
540

(b) Partial variation



541  
542

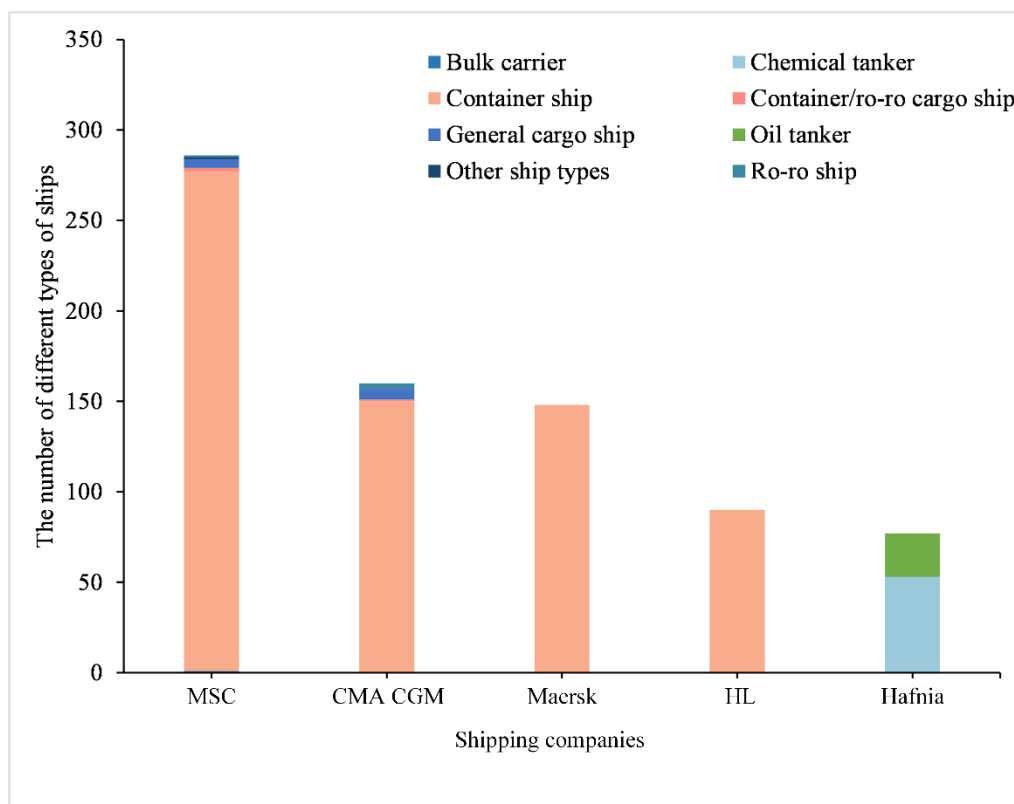
(c) Continuous variation

543 Figure 17. The temporal trend of EIV reported by ships

544 **4. Case studies of five shipping companies**

545 To explore whether shipping companies have optimized the carbon emissions of  
 546 their vessels during the implementation of the MRV system, we evaluate their carbon  
 547 emission performance based on their annual average CO<sub>2</sub> emissions per distance for

548 ships reported by different companies in the MRV system. We also evaluate their  
 549 carbon emission performance based on the companies' sustainability reports or annual  
 550 reports. We first select ships recording their annual average CO<sub>2</sub> emissions per distance  
 551 from 2018 to 2021 and identify the shipping companies that own them from the  
 552 Shipping Intelligence Network database based on their IMO numbers. Then, we select  
 553 the five shipping companies that report the largest numbers of ships to the MRV system  
 554 and analyze their carbon emission performance. The five shipping companies are  
 555 MSC<sup>10</sup>, CMA CGM<sup>11</sup>, Maersk<sup>12</sup>, HL<sup>13</sup>, and Hafnia<sup>14</sup>, which have 286, 160, 148, 90  
 556 and 77 vessels reporting the annual average CO<sub>2</sub> emissions per distance from 2018 to  
 557 2021, representing 4.7%, 2.7%, 2.5%, 1.5%, and 1.3% of the total vessels selected.



558  
 559 Figure 18. The number of different types of ships under the five shipping companies  
 560 reporting the highest number of ships

561 We first analyze the number of different types of ships reported. Figure 18  
 562 indicates that the types of vessels reported by MSC, CMA CGM, Maersk, and HL are  
 563 mainly container ships, which constitute 96.5%, 93.8%, 100%, and 100% of all vessels

<sup>10</sup> <https://www.msc.com/>.

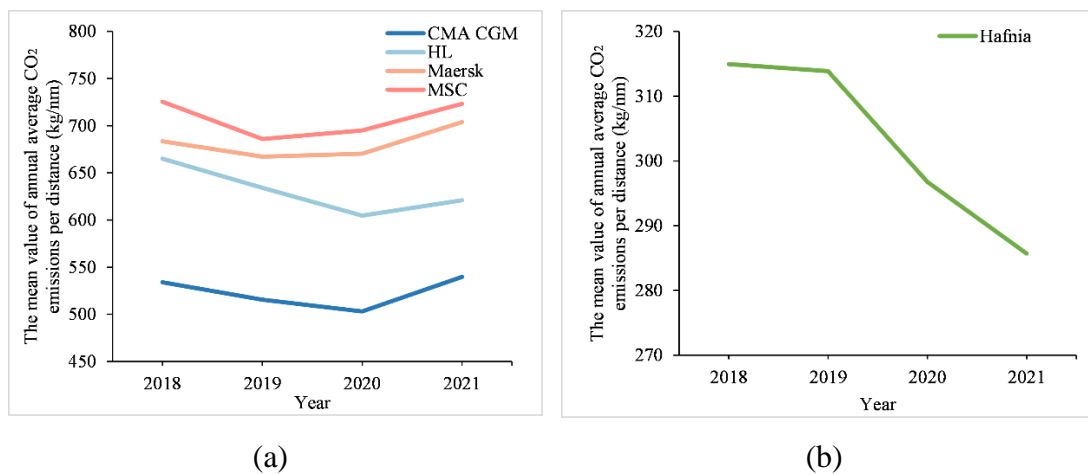
<sup>11</sup> <https://www.cma-cgm.com/>.

<sup>12</sup> <https://www.maersk.com/>.

<sup>13</sup> <https://www.hapag-lloyd.com/en/home.html>.

<sup>14</sup> <https://hafniabw.com/>.

564 reported, respectively. The vessels reported by Hafnia are chemical tankers and oil  
 565 tankers, with chemical tankers accounting for 68.8% and oil tankers 31.2%. Then, we  
 566 calculate the mean values of the annual average CO<sub>2</sub> emissions per distance from 2018  
 567 to 2021 for the fleets of the five shipping companies. Figure 19 shows that the mean  
 568 values of the annual average CO<sub>2</sub> emissions per distance for the five shipping  
 569 companies' fleets show a decline from 2018 to 2020. In addition, the mean values of  
 570 the annual average CO<sub>2</sub> emissions per distance for the fleets of MSC, CMA CGM,  
 571 Maersk, and HL increase from 2020 to 2021, while that for Hafnia's fleet decreases  
 572 from 2020 to 2021, differing from the other four shipping companies.



573 Figure 19. The temporal trend of the mean value of annual average CO<sub>2</sub> emissions per  
 574 distance for the fleets of five shipping companies

575 Furthermore, to accurately determine whether the shipping companies have  
 576 optimized the CO<sub>2</sub> emissions of their vessels, we use statistical methods to test whether  
 577 there is a significant difference in their annual average CO<sub>2</sub> emissions per distance for  
 578 two consecutive years. As the sample data do not follow a normal distribution and the  
 579 paired differences are also not normally distributed, we use the Wilcoxon signed-rank  
 580 test to assess whether the population mean ranks of the annual average CO<sub>2</sub> emissions  
 581 for two consecutive years differ. The test results are shown in Table 2.

582  
583

Table 2. The results of Wilcoxon signed-rank test for the five shipping companies

Shipping company	Paired years		
	2018–2019	2019–2020	2020–2021
MSC	<0.001***	0.328	<0.001***
Maersk	<0.001***	0.170	<0.001***
CMA CGM	0.007**	0.003**	<0.001***
HL	0.251	<0.001***	0.018*
Hafnia	0.955	0.011*	0.122

584 Note: “\*” represents significance level of 0.05; “\*\*” represents significance level of 0.01; “\*\*\*”  
585 represents significance level of 0.001.

586 (1) MSC and Maersk

587 For MSC and Maersk, the annual average CO<sub>2</sub> emissions per distance of their ships  
588 in 2018 and 2019 are significantly different at the 0.05 level, there is no significant  
589 difference between 2019 and 2020, and there is a significant difference between 2020  
590 and 2021.

591 The change in the annual average CO<sub>2</sub> emissions per distance for MSC and Maersk  
592 from 2018 to 2019 can be attributed to the measures taken by both companies to reduce  
593 their carbon footprints. Based on the sustainability reports provided by MSC (2018 and  
594 2019), the company has adopted various measures to reduce its energy consumption  
595 and CO<sub>2</sub> emissions. These measures include recording and analyzing its ships’  
596 performance based on the Energy Efficiency Operational Indicator (EEOI)  
597 (Kanberoğlu and Kökkülünk, 2021), real-time ship performance monitoring, and vessel  
598 adaptation and enhancement. Similarly, Maersk has sought to optimize the energy  
599 efficiency of its fleet by adopting technical retrofitting measures, such as new bulbous  
600 bows, new propellers, and engine modifications (Maersk, 2018 and 2019). These  
601 measures help to reduce resistance and increase the propulsion efficiency of ships,  
602 resulting in lower fuel consumption and CO<sub>2</sub> emissions.

603 Although the annual average CO<sub>2</sub> emissions per distance in 2020 and 2021 are  
604 significantly different, the underlying reasons for the change differ from those in the  
605 case of 2018–2019. In 2021, COVID-19 led to a significant increase in transportation  
606 demand from MSC customers. To address this demand, MSC added a substantial  
607 number of second-hand vessels to its fleet, resulting in a 2.6% increase in the  
608 company’s EEOI (MSC, 2020 and 2021). Additionally, the increase in the use of

609 exhaust gas cleaning system (EGCS) installations due to the higher number of MSC  
610 vessels contributed to the increase in the EEOI. Although EGCS installations help to  
611 reduce air pollution, they decrease vessels' energy efficiency, leading to higher CO<sub>2</sub>  
612 emissions (MSC, 2021). Similarly, Maersk also experienced an increase in its EEOI of  
613 6.9% from 2020 to 2021, which was due to the disruption to the global supply chain  
614 triggered by the COVID-19 pandemic (Maersk, 2020 and 2021). The disruption caused  
615 delays in shipping schedules, forcing vessels to sail at maximum speed to meet the  
616 increased shipping demand in 2021<sup>15</sup> (Maersk, 2021b). Additionally, the disruption  
617 resulted in delayed deliveries of perishable goods, which in turn required reefer  
618 containers to work overtime to protect delayed items (Maersk, 2021a). These actions  
619 resulted in increased ship fuel consumption and emissions from Maersk's fleet.  
620 Therefore, despite the efforts of MSC and Maersk to reduce their carbon footprints, we  
621 find that the annual average CO<sub>2</sub> emissions per distance for both companies increase  
622 significantly from 2020 to 2021. The COVID-19 pandemic has presented new  
623 challenges to the shipping industry, and the industry needs to develop innovative  
624 solutions to reduce its emissions while meeting growing customer demands and  
625 ensuring supply chain resilience. It is crucial for the industry to continue to adopt  
626 sustainable practices, such as the use of alternative fuels, more efficient logistics  
627 processes, and greener supply chain management, to achieve sustainability in the future.

## 628 (2) CMA CGM and HL

629 For CMA CGM and HL, their fleets' annual average CO<sub>2</sub> emissions per distance  
630 in 2019 and 2020 are significantly different at the 0.05 level, and there is also a  
631 significant difference between 2020 and 2021. In addition, for CMA CGM, there is a  
632 significant difference between 2018 and 2019; however, for HL, there is no significant  
633 difference between 2018 and 2019.

634 According to the sustainability reports for the 2018–2021 period provided by HL  
635 and CMA CGM, both companies have taken measures to reduce their carbon footprints  
636 by improving their ships' energy efficiency and reducing fuel consumption (HL, 2018,  
637 2019, 2020, and 2021; CMA CGM, 2018, 2019, 2020, and 2021). They have  
638 implemented technical measures such as retrofitting ships and optimizing bulbous bows  
639 and propellers, as well as operational measures such as optimizing routes and training

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<sup>15</sup> Maersk's seaborne cargo volumes from 2018 to 2021 are 13,306, 13,296, 12,634, 13,089 FFE ('000), respectively. The value experienced a significant reduction in 2020 due to the global pandemic, but saw a sudden surge in 2021, nearly recovering to the pre-2020 level. "FFE in '000" means that the loaded volume is given in thousands of FFE (forty-foot equivalent) units.

640 marine personnel. In all three years considered, the annual average CO<sub>2</sub> emissions per  
641 distance vary significantly for CMA CGM. However, the performance of HL is slightly  
642 different. Specifically, with the exception of 2018–2019, its annual average CO<sub>2</sub>  
643 emissions per distance are significantly different among the years considered. Upon  
644 examining the fuel consumption per loaded container for each company in 2018 and  
645 2019, we find that CMA CGM reports a 9% reduction in fuel consumption per loaded  
646 container in 2019 compared with 2018 (CMA CGM, 2018 and 2019), while HL reports  
647 only a 6% reduction in bunker consumption per slot in 2019 compared with 2018 (HL,  
648 2018 and 2019). These results indicate that CMA CGM may have implemented more  
649 effective fuel-saving measures or invested more in fuel-efficient technologies than HL  
650 during this period.

651 In 2020–2021, the situation was again affected by the COVID-19 pandemic.  
652 Similar to MSC and Maersk, HL and CMA CGM show large increases in their annual  
653 average CO<sub>2</sub> emissions per distance from 2020 to 2021. HL’s fuel consumption per slot  
654 in 2021 remains unchanged from the previous year due to the COVID-19 pandemic’s  
655 influence; for example, there are longer port stops, delays, and higher ship speeds, as  
656 well as the added difficulty of planning due to many ports operating on a first come,  
657 first served basis (HL, 2021). Meanwhile, CMA CGM’s CO<sub>2</sub> emissions per container  
658 transported increase by 3% in 2021 due to the rebound in activity after the COVID-19  
659 pandemic (CMA CGM, 2021). Heavy global port congestion requires vessel fleet  
660 adjustments, fleet phase-ins/outs, and speed increases to compensate for waiting times,  
661 impacting emission performance.

### 662 (3) Hafnia

663 For Hafnia, the annual average CO<sub>2</sub> emissions per distance in 2019 and 2020 are  
664 significantly different at the 0.05 level, but no significant difference is observed  
665 between 2018 and 2019 or between 2020 and 2021.

666 From 2019 to 2020, Hafnia demonstrates a significant reduction in annual average  
667 CO<sub>2</sub> emissions per distance, with its EEOI decreasing from 11.8 to 10.9 (Hafnia, 2019  
668 and 2020), highlighting the company’s commitment to reducing emissions and  
669 enhancing its energy efficiency through strategic initiatives. Hafnia adopts a data-  
670 centric approach and implements a computerized performance system across its fleet to  
671 optimize vessel performance and ensure regulatory compliance (Hafnia, 2019). This  
672 system supports weather routing, speed optimization, and communication with onboard  
673 teams for training purposes. Additionally, Hafnia focuses on upgrading its fleet and

674 enhancing its efficiency in various ways, such as increasing propeller diameters,  
675 installing ballast water treatment systems, and utilizing a fixed online performance  
676 measurement indicator system to optimize the main engine's fuel consumption. These  
677 efforts are complemented by other measures, including intermittent dry docking and  
678 opportunistic fleet renewal, demonstrating Hafnia's efforts to achieve its emissions  
679 reduction goals; as a result, its annual average CO<sub>2</sub> emissions per distance decrease  
680 significantly in 2020.

681 In contrast to other shipping companies, Hafnia mainly operates oil and chemical  
682 tankers, which were less affected by the COVID-19 pandemic than container ships. Oil  
683 and chemical tankers transport essential goods that are critical to many industries,  
684 meaning that the demand for these goods remained relatively stable during the  
685 pandemic, enabling Hafnia to sustain its operations. Furthermore, oil and chemical  
686 tankers typically have simpler routes, making fewer stops and being less affected by  
687 disruptions such as port closures. For example, a typical oil tanker that carries crude oil  
688 from the Middle East to Japan first passes through the Strait of Hormuz from Ras  
689 Tanura Port in Saudi Arabia. It then enters the Indian Ocean, navigates through the  
690 Strait of Malacca and the Strait of Singapore, and sails across the Pacific Ocean. Finally,  
691 it reaches Tokyo Bay. Along this route, the oil tanker only visits major ports, such as  
692 Jebel Ali Port and Fujairah Port in the Middle East, Port Klang and the Port of  
693 Singapore in Southeast Asia, and the Yokohama Port in Japan. Using the MRV data,  
694 we calculate the mean values of the annual time spent at sea and the annual sailing  
695 distances of oil tankers, chemical tankers, and container ships visiting EU ports from  
696 2018 to 2021. We find that the mean value of the annual time spent at sea for container  
697 ships is 17.0% and 23.9% higher than that of chemical tankers and oil tankers,  
698 respectively, while the mean value of the annual sailing distance of container ships is  
699 58.9% and 80.0% higher than that of chemical tankers and oil tankers. Therefore, oil  
700 and chemical tankers transport goods over shorter distances than container ships, which  
701 spend more time at sea; they were therefore exposed to more risks during the pandemic.  
702 As a result of Hafnia's strategic initiatives and the nature of its operations, its EEOI for  
703 2021 is improved by 2% compared with 2020 (Hafnia, 2021). Therefore, Hafnia's  
704 annual average CO<sub>2</sub> emissions per distance do not change significantly from 2020 to  
705 2021, while the annual average CO<sub>2</sub> emissions of other shipping companies increase  
706 due to COVID-19.

## 707 **5. Policy recommendation and management strategies**

### 708 **5.1 Facilitating collaboration and knowledge sharing**

709 The MRV system could serve as a platform to promote collaboration and  
710 knowledge sharing among shipping companies, industry stakeholders, and  
711 policymakers. For example, the EU can assess the energy performance of shipping  
712 companies based on their energy efficiency indicators reported in the MRV system.  
713 Based on the assessment results, the EU can identify the shipping companies that  
714 exhibit the most effective green shipping practices and invite them to share details of  
715 the retrofitting measures and clean technologies adopted. By facilitating such  
716 collaboration and knowledge sharing, the MRV system can promote the exchange of  
717 best practices in energy efficiency, emissions reduction, and the adoption of cleaner  
718 technologies. Shipping companies can learn about various successful emissions  
719 reduction experiences via this platform, helping them to select the most suitable  
720 practices in vessel operations, such as optimizing routes, reducing speeds, and  
721 implementing weather routing. This can help them to reduce their fuel consumption and  
722 emissions while maintaining competitiveness in the industry. In addition, the EU can  
723 organize workshops, webinars, and conferences to establish a common understanding  
724 of the challenges and opportunities among shipping companies, driving collective  
725 action toward a more sustainable shipping industry. This collaborative approach can  
726 also foster innovation and enable stakeholders to leverage one another's expertise and  
727 resources, ultimately leading to more effective climate action.

### 728 **5.2 Supporting the development of green shipping infrastructure**

729 Beginning in at least 2020, many shipping companies set ambitious goals to  
730 achieve carbon neutrality by 2050 by reducing their carbon footprints. For instance, in  
731 2020, CMA CGM established this as its new objective. In pursuit of carbon neutrality,  
732 shipping companies are exploring alternative fuels such as LNG. Despite its potential  
733 to reduce GHG emissions, challenges in adopting LNG remain. A key difficulty is the  
734 lack of developed infrastructure, such as bunkering facilities and port storage terminals,  
735 making it difficult for companies to ensure fuel availability. Additionally, the  
736 retrofitting of vessels for LNG storage and handling can be complex and costly,  
737 possibly deterring some companies from adopting LNG-powered ships. Given these  
738 challenges, it is vital for the EU to support green shipping infrastructure development  
739 by investing in the expansion and modernization of LNG facilities and considering  
740 financial incentives, such as grants, tax breaks, or subsidies, to encourage investment

741 in LNG-powered vessels and retrofitting projects (Schroer et al., 2022). Another crucial  
742 aspect of green shipping infrastructure development is investing in onshore power  
743 supply facilities at ports (Wang et al., 2021). These facilities enable ships to switch off  
744 their engines while at berth, reducing emissions and contributing to improved air quality  
745 in port areas. By providing access to onshore power, the EU can further support  
746 shipping companies in their efforts to reduce their emissions and achieve their carbon  
747 neutrality goals by 2050.

### 748 **5.3 Encouraging more accurate emissions monitoring methods**

749 Although method A (BDN and the periodic stocktakes of fuel tank) is the most  
750 widely used approach to monitoring emissions in vessels calling at EU ports, there are  
751 three alternative methods that can provide higher levels of accuracy. To encourage the  
752 adoption of these more accurate methods, i.e., methods B (bunker fuel tank monitoring  
753 on board), C (flow meters for applicable combustion processes), and D (direct CO<sub>2</sub>  
754 emissions measurements), EU governments can implement a range of incentives for  
755 shipping companies. One approach is to offer reduced port fees for vessels utilizing  
756 more accurate monitoring methods, which can serve as a financial incentive for  
757 companies to invest in more accurate monitoring systems. Another approach is to  
758 provide preferential berthing arrangements for ships that use more accurate monitoring  
759 methods, such as offering priority access to berths, reducing waiting times, or even  
760 reserving berths for these ships. This can help shipping companies to save time and  
761 reduce their operating costs, making the adoption of more accurate monitoring methods  
762 more appealing. Furthermore, the EU can provide support for the implementation of  
763 the three alternative methods, such as offering training, resources, and expert guidance  
764 to help companies to navigate the process of selecting and implementing more accurate  
765 monitoring methods. By implementing these incentives and supporting the adoption of  
766 more accurate fuel consumption and emissions monitoring methods, EU governments  
767 can help to improve data reliability in the shipping industry, leading to improved  
768 environmental performance and more effective regulatory oversight.

## 769 **6. Conclusion and future work**

770 The shipping industry contributes considerably to global GHG emissions, making  
771 it essential to identify effective strategies to reduce the impact on the environment. The  
772 EU has set ambitious goals regarding the reduction of shipping-related GHG emissions,  
773 and it has implemented an MRV system for large ships (more than 5,000 gross tonnage)  
774 calling at EU ports to gather information related to their CO<sub>2</sub> emissions and energy

775 efficiency. The MRV system has been operating for five years, and four years of MRV  
776 data have been accumulated as of May 2023. However, the MRV data have not been  
777 fully analyzed, particularly in terms of the temporal trends of key parameters in the  
778 MRV reports and the emission performance of shipping companies during the MRV  
779 implementation period.

780 By addressing these gaps, this study conducts an analysis of the MRV data from  
781 2018 to 2021. We first analyze the trends in the ship's basic profile in the MRV system.  
782 We identify a decline in the number of ships across different types between 2019 and  
783 2020, revealing that passenger ships were the most influenced by the COVID-19  
784 pandemic. We also examine the top 10 flag states in the MRV system, finding that  
785 China, Japan, and Greece are absent, despite being in the top 10 in terms of the total  
786 number of registered vessels. This discrepancy could be due to the MRV system's focus  
787 on ships over 5,000 gross tonnage, as these countries have comparatively fewer ships  
788 of this size. Second, the trends in ship emissions monitoring methods and results are  
789 analyzed. We find that method A (BDN and the periodic stocktakes of fuel tank) is the  
790 most prevalent during 2018–2021, accounting for over 40% of usage, due to its  
791 simplicity and cost-effectiveness. We also calculate the mean and median values of  
792 annual fuel consumption and CO<sub>2</sub> emissions, which demonstrate a decreasing trend.  
793 We also observe a significant decrease in the use of heavy fuel oil in 2020, alongside a  
794 surge in light fuel oil consumption. These findings highlight the impact of more  
795 stringent emissions regulations on the shipping industry. Third, we analyze the trends  
796 in ship energy efficiency. We categorize ships according to the time-varying  
797 characteristics of their EEDI, discovering that nearly 92% of the ships exhibit constant  
798 values from 2018 to 2021. A similar trend is observed with the EIV, where 71% of the  
799 ships exhibit consistency during this period. The reason for these findings is that the  
800 EEDI and EIV are determined by vessel design parameters and energy-efficient  
801 technologies, which remain relatively fixed in the short term.

802 Furthermore, the case study of five shipping companies evaluates their carbon  
803 emission performance and highlights the impact of the COVID-19 pandemic on  
804 maritime transport. The Wilcoxon signed-rank test is adopted to examine whether there  
805 is a significant difference in the annual average CO<sub>2</sub> emissions per distance of these  
806 companies for two consecutive years. The results show that MSC, Maersk, and CMA  
807 CGM experience a significant decrease in annual average CO<sub>2</sub> emissions per distance  
808 between 2018 and 2019, due to the implementation of technical measures, such as

809 retrofitting ships and optimizing bulbous bows and propellers. However, the COVID-  
810 19 pandemic in 2020 led to significant increases in annual average CO<sub>2</sub> emissions per  
811 distance for all companies except Hafnia, as vessels sailed at higher speeds to  
812 compensate for lost time and delays. Compared with other shipping companies,  
813 Hafnia's operations were less affected by the COVID-19 pandemic, as it primarily  
814 operates oil and chemical tankers, which are less susceptible to disruptions. This study  
815 highlights the need for the shipping industry to develop innovative solutions to reduce  
816 emissions while meeting growing customer demands and ensuring supply chain  
817 resilience.

818 The findings of this study provide valuable insights for policymakers and industry  
819 stakeholders on the effectiveness of the MRV system in promoting decarbonization in  
820 the shipping industry. Based on these findings, we offer several policy  
821 recommendations and management strategies, such as facilitating collaboration and  
822 knowledge sharing among shipping companies, investing in green shipping  
823 infrastructure development, and encouraging the adoption of accurate fuel consumption  
824 and emissions monitoring methods. These measures could help to improve the MRV  
825 system and promote a more sustainable shipping industry in the EU and around the  
826 world, ultimately helping to achieve emissions reduction targets.

827 To further enhance our understanding of carbon emissions of vessels calling at the  
828 EU ports and enlighten more effective strategies for reducing its impact on the  
829 environment, future work can focus on two key aspects. First, by combining automatic  
830 identification system (AIS) data and MRV data, researchers can examine vessel stops  
831 at different ports to estimate carbon emissions associated with each port. This analysis  
832 can help identify high-emission ports and guide the development of targeted emission  
833 reduction strategies. In addition, AIS data can be combined with vessel characteristic  
834 data to explore the relationship between factors such as vessel type, age, size, and the  
835 spatial distribution of carbon emissions. This helps identify the carbon emission  
836 characteristics of specific vessel types or regions, providing guidance for targeted  
837 emission reduction measures. Second, we only select five word-leading shipping  
838 companies to investigate the emission performance of shipping companies during the  
839 MRV implementation period. While these companies have demonstrated efforts  
840 towards emission reduction, it should be acknowledged that the shipping companies  
841 with vessels visiting EU ports are diverse, encompassing a wide range of vessel types  
842 and sizes. Therefore, future research should include a broader range of shipping

843 companies with ships visiting EU ports to gain a more comprehensive understanding  
844 of their emission profiles and optimization practices.

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